

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

LUCKY BUCKS HOLDINGS LLC,

Debtor.

MARC ABRAMS,
In his capacity as Chapter 7 Trustee of Lucky
Bucks Holdings LLC and as assignee,

Plaintiff,

v.

TRIVE CAPITAL MANAGEMENT LLC,
et al.,

Defendants.

Chapter 7

No. 23-10756 (KBO)

Adversary Proceeding

No. 24-ap-50130 (KBO)

ORDER GRANTING TRIVE DEFENDANTS' MOTION TO COMPEL

UPON CONSIDERATION of the *Trive Defendants' Motion to Compel*, dated August 12, 2025 (the "Motion"); and the Court having reviewed the Motion and the accompanying Memorandum of Law, Firsenbaum Declaration, and exhibits thereto¹; and the objections and replies, if any; and the Court having considered the arguments made by counsel for the parties; and the Court having determined that the legal and factual bases set forth in the Motion and Memorandum of Law, Firsenbaum Declaration, and exhibits thereto establish just cause for the relief granted the Motion; and after due deliberation and sufficient cause appearing therefor IT IS HEREBY ORDERED that:

1. The Motion is GRANTED;

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion and Memorandum of Law.

2. The Trustee is ordered to produce to the Trive Defendants the Core Noteholder Documents as described in the Memorandum of Law promptly, and, in all events, no later than 7 days from the entry of this Order; and
3. This Court shall retain jurisdiction with respect to all matters arising from or relating to the implementation of this Order.

Dated: _____, 2025

The Honorable Karen B. Owens
United States Bankruptcy Judge